

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA	)	
	)	No. 1:18-CR-457
v.	)	
	)	The Honorable Anthony J. Trenga
BIJAN RAFIEKIAN,	)	
a/k/a "Bijan Kian"	)	Trial: July 15, 2019
	)	
	)	
Defendant.	)	
	)	

---

GOVERNMENT'S TRIAL EXHIBITS

<b>EXHIBIT No.</b>	<b>EXHIBIT</b>	<b>ADMITTED</b>
1	<b>RESERVED</b>	
2	Photograph of Alptekin	
2A	Email from Alptekin to Korkmaz, Subject cavusoglu, dated October 28, 2016	
2B	Photograph of Cavusoglu and Alptekin Attachment (Cost and revenue pro forma) to Email from Alptekin to Korkmaz, Subject cavusoglu, dated October 28, 2016	
3	<b>RESERVED</b>	
4	Photograph of Gulen	
5	Photograph of Erdogan	
6	<b>RESERVED</b>	
7	<b>RESERVED</b>	
8A	Computer Screenshot of Email from Alptekin to Rafiekian, Subject: Re: All good to go, dated July 27, 2016	
8B	Email from Rafiekian to Alptekin, Subject: All good to go, dated July 27, 2016 (2 pages)	

9	Email from Alptekin to Rafiekian, Subject: All good to go, dated July 29, 2016 (2 pages)	
9A	Photograph of Cavusoglu	
9B	Photograph of Cavusoglu	
10	Email from Rafiekian to Alptekin, Subject: Truth, dated July 30, 2016 (2 pages)	
10A	Email from Flynn to FIG, Subject: Re:Truth, dated July 30, 2016	
11	Email from Rafiekian to Alptekin, Subject: We are ready, dated August 2, 2016	
12	Email from Flynn to Rafiekian, Subject: Re:Re: Truth, dated August 4, 2016	
13	Email from Rafiekian to Alptekin, Subject: Re:Truth, dated August 4, 2016 (4 pages)	
14	Email from Alptekin to Flynn, Subject: Re:Truth, dated August 8, 2016	
14A	Email from Rafiekian to Alptekin, Subject: Re:Truth, dated August 8, 2016	
14B	Photograph of Yildirim	
14C	Photograph of Nihat Zeybekci	
15	Email from Rafiekian to Flynn, Subject: Re: Truth, dated August 4, 2016 (3 pages)	
15A	The New York Times, Turkey's New Anti-Americanism, dated Aug. 4, 2016 (3 pages) Link ( <a href="http://nyti.ms/2avkkES">http://nyti.ms/2avkkES</a> ) on Email from Alptekin to Rafiekian, Subject: Re: Truth, dated August 10, 2016	
16	Email from Alptekin to Flynn & Rafiekian, Subject: Re:Truth, dated August 10, 2016 (6 pages)	
17	Email from Rafiekian to Alptekin, Subject: Re: Welcome back!, dated August 11, 2016 (3 pages)	
17A	Email from Alptekin to Rafiekian, Subject: Re: Welcome back!, dated August 11, 2016 (2 pages)	
18A	Email from Rafiekian to Flynn, Subject: Confidence through Clarity Campaign – Operation Confidence, dated August 11, 2016 (2 pages)	
18B	Confidence through Clarity Spreadsheet Attachment (Cost and revenue pro forma) to Email from Rafiekian to Flynn, Subject: Confidence through Clarity Campaign – Operation Confidence, dated August 11, 2016	
19	Email from Rafiekian to Alptekin, Subject: Action update, dated August 25, 2016	

20	Skype Chat between Alptekin and Rafiekian, dated August 25, 2016 (2 pages)	
20A	Photograph of Turkish bridge	
21	Skype Chats between Rafiekian and Alptekin, dated August 29, 2016 to August 30, 2016	
22A	Email from Rafiekian to Alptekin, Subject: Confidence, dated September 3, 2016	
22B	Independent Advisory Services Agreement (3 pages) Attachment (Advisory Agreement BK MF) to Email from Rafiekian to Alptekin, Subject: Confidence, dated September 3, 2016	
23A	Email from Rafiekian to Flynn, Subject: Operation Confidence Playbook- For BK and MF only, dated September 5, 2016 (2 pages)	
23B	Operation Confidence Playbook (6 pages) Attachment (Playbook Operation Confidence BK) to Email from Rafiekian to Flynn, Subject: Operation Confidence Playbook- For BK and MF only, dated September 5, 2016	
24A	Email from Rafiekian to Flynn, Subject: NYC- September 19 or 20th, dated September 6, 2016	
24B	Email from Rafiekian to Flynn, Subject: Re: September 19 or 20th, dated September 9, 2016	
25A	Bank of America, Statement for September 1, 2016 to September 30, 2016 for Account No. ending in 6215 (6 pages) \$200,000 wire	
25A-1	Bank of America, two affidavits and a Certification of the Records (5 pages)	
25B	Email from Rafiekian to Flynn, Subject: Wire to Ekim, dated September 12, 2016	
25C	Email from Rafiekian to Flynn, Subject: Advisory Agreement (General Scope) for Ekim Alptekin, dated September 12, 2016	
25D	Independent Advisory Services Agreement (2 pages) Attachment (Ekim Advisory Agreement BK 9122016.docx) to Email from Rafiekian to Flynn, Subject: Advisory Agreement (General Scope) for Ekim Alptekin, dated September 12, 2016	

26A	Email from Rafiekian to Flynn, Subject: Talking Points, dated September 18, 2016	
26B	Background and Talking Points (4 pages) Agreement (Background and Talking Points9192016.docx) to Email from Rafiekian to Flynn, Subject: Talking Points, dated September 18, 2016	
28A	Photograph of Barak Albayrak	
28B	U.S. Customs and Border Protection, TECS – Person Encounter List on Alptekin, Kamil start and end date range 09/01/2015 – 09/01/2017 (3 pages)	
28B-1	Certificate of Authenticity, dated June 26, 2019 (2 pages) On U.S. Customs and Border Protection, TECS – Person Encounter List on Alptekin, Kamil start and end date range 09/01/2015 – 09/01/2017	
29	Email from Rafiekian to Flynn, Subject Confidence, dated September 21, 2016	
30A	Email from Boston to Miller and Rafiekian, Subject: Congressional Outreach, dated Octover 11, 2016	
30B	Email from Miller to Boston, Subject: mid-week update, dated October 12, 2016 (2 pages)	
33A	Email from Rafiekian to Alptekin, Subject: Invoice, dated October 7, 2016	
33B	FIG Invoice, dated October 7, 2016, Total Invoice Amount \$200,000 Attachment (Invoice second payment 1072016) to Email from Rafiekian to Alptekin, Subject: Invoice, dated October 7, 2016	
33C	Email from Rafiekian to Employee of Company A, Subject: Wire Transfer to Inovo BV, dated October 11, 2016	
34	Bank of America Statement, FIG Account No. ending in 6215, for October 1, 2016 to October 31, 2016 (8 pages) (October 11, 2016 – Alptekin caused \$185,000 to be wire transferred from a Turkish bank account in Alptekin's name to Company A's U.S. bank account.)	
35A	Email from Refiekian to Flynn and Alptekin, Subject: Fwd:Inivo, dated October 14, 2016	
35B	Inovo Invoice, FIG, total \$40,000, Invoice dated Octover 14, 2016 Attachment (image1.png) to Email from Refiekian to Flynn and Alptekin, Subject: Fwd:Inivo, dated October 14, 2016	
36	<b>RESERVED</b>	

37A	Email from Rafiekian to Alptekin, Subject: Invoie, dated November 10, 2016	
37B	FIG Invoice, Total Invoie Amount \$200,000, Dated November 10, 2016 Attachment (Invoice third payment 11102016.pdf) to Email from Rafiekian to Alptekin, Subject: Invoie, dated November 10, 2016	
38	Bank of America Statement, FIG Account No. ending in 6215, for November 1, 2016 to November 30, 2016 (8 pages) (November 14, 2016 – Alptekin caused \$145,000 to be wire transferred from a Turkish bank account in Alptekin's name to Company A's U.S. bank account.)	
39	<b>RESERVED</b>	
40	Text Message from Flynn to Project Team including Alptekin, dated October 22, 2016	
41	Skype Chats between Rafiekian and Alptekin, dated September 14, 2016 to September 15, 2016	
42	Handwritten Notes, Weekly conference call (5 pages)	
43A	Email from Boston to Rafiekian, Subject: Talking Points for Oct 14, dated October 13, 2016	
43B	FIG Project Confidence Talking Points, October 14, 2016 (16 pages) Attachment (Talking Points 10142016.docx) to Email from Boston to Rafiekian, Subject: Talking Points for Oct 14, dated October 13, 2016	
43C	Gulenopoly Board Attachment (Gulenopoly Board(l).pdf) to Email from Boston to Rafiekian, Subject: Talking Points for Oct 14, dated October 13, 2016	
43D	Politico tipsheet, retrieved Oct 13, 2016 Attachment (Politico.pptx) to Email from Boston to Rafiekian, Subject: Talking Points for Oct 14, dated October 13, 2016	
43E	Gulenopoly Citations (2 pages) Attachment (Gulenopoly Citations(l).docx) to Email from Boston to Rafiekian, Subject: Talking Points for Oct 14, dated October 13, 2016	
43F	First Draft – Gulen Briefing Sheet (2 pages) Attachment (Gulen Briefing Sheet(l).docx) to Email from Boston to Rafiekian, Subject: Talking Points for Oct 14, dated October 13, 2016	
44	<b>RESERVED</b>	
45A	Email from Rafiekian to Alptekin and Kelley, Subject: Getting Turkey Wrong, dated November 2, 2016	

45B	Getting Turkey Wrong (6 pages) Attachment (GETTING TURKEY WRONG.docx) to Email from Rafiekian to Alptekin and Kelley, Subject: Getting Turkey Wrong, dated November 2, 2016	
46	<b>RESERVED</b>	
47	Email from Rafiekian to Flynn, Subject: Re: Tim Kaine congratulates Gulenists in a letter - Ragip Soylu - Daily Sabah, dated November 3, 2016 (2 pages)	
48A	Email from Rafiekian to Alptekin, Subject: Update, dated November 4, 2016 (2 pages)	
48B	Our Ally Turkey Is in Crisis and Needs Our Support (4 pages) Attachment (TurkeyMTF1132016.pdf) to Email from Rafiekian to Alptekin, Subject: Update, dated November 4, 2016	
49	Email from Alptekin to Rafiekian, Subject: Re: Update, dated November 5, 2016	
50	The Hill   Our ally Turkey is in crisis and needs our support, by Flynn, dated November 8, 2016 (4 pages)	
51	<b>RESERVED</b>	
52	<b>RESERVED</b>	
53	<b>RESERVED</b>	
54	<b>RESERVED</b>	
55	<b>RESERVED</b>	
56	Registration Statement (Received by NSD/FARA Registration Unit 03/07/2017 6:02:45 PM) Registrant: Flynn Intel Group, Inc., Registration No. 6406 (7 pages)	
57	<b>RESERVED</b>	
58	Exhibit A and Exhibit B to Registration Statement and signed Independent Advisory Services Agreement dated 8/9/2016 (Received by NSD/FARA Registration Unit 03/07/2017 6:02:45 PM) Registrant: Flynn Intel Group, Inc., Registration No. 6406 (8 pages)	
59	<b>RESERVED</b>	
60	<b>RESERVED</b>	
61	Supplemental Statement (Received by NSD/FARA Registration Unit 03/07/2017 6:02:45 PM) Name of Registrant: Flynn Intel Group, Inc., Registration No. 6406 (13 pages)	

62	<b>RESERVED</b>	
63	<b>RESERVED</b>	
64	Short Form Registration Statement (Received by NSD/FARA Registration Unit 03/07/2017 6:02:45 PM) Name: Lt. Gen Michael T. Flynn (Ret.), Registration No. 6406 (3 pages)	
65	Short Form Registration Statement, (Received by NSD/FARA Registration Unit 03/07/2017 6:02:45 PM) Name: Bijan Rafiekian, Registration No. 6406 (3 pages)	
66	Flynn Intel Group, Inc., State of Delaware Certificate of Incorporation a Stock Corporation (Received by NSD/FARA Registration Unit 03/07/2017 6:02:45 PM) (18 pages)	
67	Skype Chats from July 26, 2016 through September 30, 2016	
67A	Skype Chat from Alptekin to Rafiekian, dated July 31, 2016	
67B	Skype Chat between Rafiekian and Alptekin, dated August 13, 2016 to August 14, 2016	
67C	Skype Chat between Alptekin and Rafiekian, dated August 14, 2016	
67D	Skype Chat between Alptekin and Rafiekian, dated August 16, 2016 to August 17, 2016	
67E	Skype Chat between Alptekin and Rafiekian, dated August 25, 2016 to August 26, 2016 (2 pages)	
67F	Skype Chat from Alptekin to Rafiekian, dated August 27, 2016	
67G	Skype Chat from Alptekin to Rafiekian, dated August 28, 2016	
67H	Skype Chat between Rafiekian and Alptekin, dated September 1, 2016 to September 2, 2016	
67I	Skype Chat between Alptekin and Rafiekian, dated September 4, 2016	
67J	Skype Chat between Alptekin and Rafiekian, dated September 8, 2016	
67K	Skype Chat from Alptekin to Rafiekian, dated September 9, 2016	
67L	Skype Chat between Alptekin and Rafiekian, dated September 9, 2016	

67M	Skype Chat from Alptekin to Rafiekian, dated September 9, 2016	
67N	Skype Chat between Alptekin and Rafiekian, dated September 9, 2016	
67O	Skype Chat between Rafiekian and Alptekin, dated September 9, 2016 (2 pages)	
67P	Skype Chat between Rafiekian and Alptekin, dated September 11, 2016	
67Q	Skype Chat between Alptekin and Rafiekian, dated September 12, 2016	
67R	Skype Chat between Rafiekian and Alptekin, dated September 13, 2016 to September 14, 2016	
67S	Skype Chat from Alptekin to Rafiekian, dated September 15, 2016 (3 pages)	
67T	Skype Chat between Alptekin and Rafiekian, dated September 28, 2016 to September 29, 2016	
68	Chart of Emails Located by FBI Information Technology Specialist Kim T. Rosecrans (2 pages)	
69A	Certificate of Authenticity - Google, dated June 24, 2017	
69B	Certificate of Authenticity - Google, dated June 24, 2017	
69C	Certificate of Authenticity - Google, dated June 24, 2017	
70A	Email from Rafiekian to Flynn, Subject: Turkey, dated November 3, 2016	
70B	Our Ally Turkey Is In Crisis and Needs Our Support (4 pages) Attachment (TurkeyMTF1132016.pdf) to Email from Rafiekian to Flynn, Subject: Turkey, dated November 3, 2016	
71	Email from Rafiekian to Flynn, Subject: Document, dated November 3, 2016	
72	Email from Flynn to FIG, Boston, Rafiekian, Subject RE: Working papers for your review, dated November 5, 2016	
73A	Email from Rafiekian to Alptekin, Subject: Working Papers, dated November 5, 2016	
73B	Road Map and Working Paper (8 pages) Attachment (roadmap1152016MBbkmf.pdf and Working paper 1152016mbbkmf.3.pdf) to Email from Rafiekian to Alptekin, Subject: Working Papers, dated November 5, 2016	

73C	Gulenopoly Board Attachment (Gulenopoly) to Email from Rafiekian to Alptekin, Subject: Working Papers, dated November 5, 2016	
74	Email from Boston to Rafiekian, Subject: Comments on the document layout, dated November 5, 2016	
75	Email from Rafiekian to Flynn and Boston, Subject: Working paper for your review, dated November 5, 2016	
76A	Email from Flynn to Rafiekian and FIG, Subject: Re: Financial Records, dated November 6, 2016	
76B	Turkey: A Friend in Need is a Friend Indeed (5 pages) Attachment (Turkey Article.docx) to Email from Flynn to Rafiekian and FIG, Subject: Re: Financial Records, dated November 6, 2016	
77	Email from Alptekin to Flynn, Subject Re: Re-sending, dated November 7, 2016	
78A	Email from Rafiekian to Alptekin, Subject: Assessment Report, dated November 7, 2016 (2 pages)	
78B	Fethullah Gulen: A Primer for Investigators, dated November 2, 2016 (70 pages) Attachment (Ongoinginvestigationgulenbkmf.pdf) to Email from Rafiekian to Alptekin, Subject: Assessment Report, dated November 7, 2016	
79A	Email from Kian to Miller, Subject: Article, dated November 7, 2016	
79B	Attachment (TurkeyMTF1132016.pdf and .docx) to Email from Kian to Miller, Subject: Article, dated November 7, 2016 (8 pages)	
80	Email from Miller to Rafiekian, Subject: Article placement, dated November 8, 2016	
81	Email from Miller to Boston, Subject: Re: Article placement, dated November 8, 2016	
82	Email from Boston to Rafiekian, Subject: Update, dated November 11, 2016	
83	Email from Rafiekian to Alptekin, Subject: Recommended Statement by Sphere, dated November 11. 2016 (2 pages)	
84	Email from Flynn to Rafiekian, Subject: Politico: Trump advisor Flynn linked to Turkish lobbying, dated November 15, 2016 (4 pages)	

85	Email from Flynn to Rafiekian, Subject: Politico: Trump advisor Flynn linked to Turkish lobbying, November 15, 2016 (6 pages)	
86	Email from Courtovich to Miller, Wyatt and Lowman, Subject: (no subject), dated November 15, 2016	
87	Email from Kian to Flynn, Subject: Politico: Trump advisor Flynn linked to Turkish lobbying, dated November 15, 2016 (5 pages)	
88A	Email from Kian to Flynn, Subject: Engagement with INOVO, dated November 17, 2016	
88B	Independent Advisory Services Agreement , dated 08/09/2016 (3 pages) Attachment (Advisory Agreement FIG INOVO-signed.pdf) to Email from Kian to Flynn, Subject: Engagement with INOVO, dated November 17, 2016	
89	Email from Burck to Kelley, Subject: Statement of Flynn Intel Group, dated November 19, 2016 (2 pages)	
90	Letter to Flynn from Hunt, Re: Possible Obligation to Register Under the Foreign Agents Registration Act, dated November 30, 2016, (3 pages)	
91	Mail -zulu1010@hotmail.com tneer Mccaudley, printed 5/23/2017	
92	Covington Letter, to Hunt from Kelner, Re: Flynn Intel Group, Inc., dated January 11, 2017	
93A	Email from Alptekin to Rafiekian, Subject: Fwd: Time sensitive- Ekim Alptekin- engagement letter (3 pages)	
93B	Arent Fox Letter, Re: Advice on Regulations for the Foreign Economic Relations Board of Turkey, dated January 18, 2017 (15 pages)	
94	Ratio Letter, Dated February 12, 2017, to Ekim Alptekin, Re: Termination Notice of Service Agreement	
94A	Inovo, Ratio Oil Exploration LP, \$5,000, Invoice No. 00046, March 2016, dated April 22, 2016	
94B	Inovo, Ratio Oil Exploration LP, \$5,000, Invoice No. 00047, April 2016, dated April 22, 2016	
94C	Inovo, Ratio Oil Exploration LP, \$5,000, Invoice No. 00048, May 2016, dated May 30, 2016	
94D	Inovo, Ratio Oil Exploration LP, \$5,000, Invoice No. 00049, June 2016,	

	dated July 4, 2016	
94E	Inovo, Ratio Oil Exploration LP, \$5,000, Invoice No. 00050, July 2016, dated July 25, 2016	
94F	Inovo, Ratio Oil Exploration LP, \$5,000, Invoice No. 00051, August 2016, dated August 25, 2016	
94G	Inovo, Ratio Oil Exploration LP, \$5,000, Invoice No. 00046, March 2016, dated April 22, 2016	
94H	Inovo, Ratio Oil Exploration LP, \$5,000, Invoice No. 00046, March 2016, dated April 22, 2016	
94I	Inovo, Ratio Oil Exploration LP, \$5,000, Invoice No. 00046, March 2016, dated April 22, 2016	
94J	Inovo, Ratio Oil Exploration LP, \$5,000, Invoice No. 00046, March 2016, dated April 22, 2016	
94K	Inovo, Ratio Oil Exploration LP, \$5,000, Invoice No. 00046, March 2016, dated April 22, 2016	
95	Email from Courtovich to Kian, Subject: Re: Reaching Out, dated August 13, 2016	
96A	Email from Miller to Courtovich, Subject: Following up on Tuesday's Meeting, dated August 18, 2016	
96B	Sphere Letter to Flynn and Rafiekian from Courtovich, Re: Partnership to Promote a Prospeprous and Stable Turkey, dated August 18, 2016 (4 pages) Attachment (attachment-1) to Email from Miller to Courtovich, Subject: Following up on Tuesday's Meeting, dated August 18, 2016	
97	Email from Miller to Courtovich, Subject: Re: Following up on Tuesday's Meeting, dated August 20, 2016	
98	Email from Miller to Courtovich dated, Subject Hello, Dated August 29, 2016 (7 pages)	
99	Email from Kian to Flynn, Subject Re: Advisory Agreement (General Scope) for Ekim Alptekin, dated September 12, 2016 (3 pages)	
100A	Email from Kian to Flynn, Subject: Revised Ekim Agreement, dated September 12, 2016	

100B	Independent Advisory Services Agreement (2 pages) Attachment (Ekim Advisory Agreement rev1BK 9122016.docx) to Email from Kian to Flynn, Subject: Revised Ekim Agreement, dated September 12, 2016	
101A	Email from Swiercz to Yudis, Subject: Turkey Brief, dated September 13, 2016	
101B	Turkey Client: FLin Intel document, dated 09/13/2016 (2 pages) Attachment (Turkey Client.docx) to Email from Swiercz to Yudis, Subject: Turkey Brief, dated September 13, 2016	
102	Email from Ahn to Pilgram, Mccaurley, and Flynn, dated September 16, 2016	
103A	Email from Kian to Alptekin, Subject: Talking Points, dated September 16, 2016	
103B	Background and Talking Points (4 pages) Attachment (Background and Talking Points91...tdf) to Email from Kian to Alptekin, Subject: Talking Points, dated September 16, 2016	
104A	Email from Flynn to Kian, Subject Re: Talking Points, dated September 18, 2016	
104B	Background and Talking Points (4 pages) Attachment (Background and Talking Points9192016.docx) to Email from Flynn to Kian, Subject Re: Talking Points, dated September 18, 2016	
105	Email from Miller to Kian, Subject: Tomorrow, dated September 19, 2016	
106	Email from Pilgram to Kian, Subject: Morning Update 9/20, dated September 20, 2016	
107A	Email from Miller to Kian, Subject: Tomorrow, dated September 21, 2016 (2 pages)	
107B	Memorandum of Understanding (2 pages) Attachment (attachment-1.pdf) to Email from Miller to Kian, Subject: Tomorrow, dated September 21, 2016	
108	Email from Alptekin to Kian, Subject: Comm Check, dated September 26, 2016	
109	Sphere Letter to Miller from Kelley and Looney, RE: Charter Schools Database, dated October 3, 2016 (2 pages)	
110A	Email from Kian to Boston, Subject: Project Confidence, dated October 4, 2016 (2 pages)	
110B	Independent Advisory Services Agreement (2 pages)	

	Attachment (Independent Contractor Agreement.docx) to Email from Kian to Boston, Subject: Project Confidence, dated October 4, 2016	
110C	Sensitive Information Non-Disclosure Agreement (2 pages) Attachment (Sensitive Information Non.docx) to Email from Kian to Boston, Subject: Project Confidence, dated October 4, 2016	
111	Sphere Letter to FIG from Miller, RE: Engagement Strategy and Activities, dated October 5, 2016 (3 pages)	
112	Email from Boston to Kian, Subject: Use of Inovo's Name, dated October 9, 2016	
113	Email from Flynn to Kian, Subject Wire Transfer to Inovo BV, dated October 13, 2016	
114	Email from Boston to Graham, dated October 13, 2016	
115	Email from Kian to Flynn, Subject: Update- Confidence, October 13, 2016	
116A	Email from Kian to Alptekin, dated October 14, 2016	
116B	Maanopoly Board Attachment (Maanopoly 5-3[1].compressed (1)(1)(1).pdf) to Email from Kian to Alptekin, dated October 14, 2016	
117	Message with number ending in 2256, dated October 14, 2016	
118A	Email from Flynn to Kian, Subject: Inivo, dated October 15, 2016	
118B	Inovo Invoice, dated October 14, 2016 Attachment (image1.png) to Email from Flynn to Kian, Subject: Inivo, dated October 15, 2016	
119A	Email from Kian to Alptekin, Subject: Updates, dated October 21, 2016	
119B	Gulenopoly Board Attachment (10212016Gulenopoly (1).pdf) to Email from Kian to Alptekin, Subject: Updates, dated October 21, 2016	
119C	Mula Mullah Board Attachment (10212016Mula Mullah Board.pdf) to Email from Kian to Alptekin, Subject: Updates, dated October 21, 2016	
120	Email from Boston to Alptekin, Subject: Update Call with Ekim, dated October 21, 2016	
121	Email from bmccauley to Kian, Subject: Update Call with Ekim, dated October 21, 2016	

122A	Email from Boston to Flynn, Subject: Weekly Conference Call Notes, dated October 22, 2016 (3 pages)	
122B	Conference Call Notes (4 pages) Attachment (Conference Call notes.docx) to Email from Boston to Flynn, Subject: Weekly Conference Call Notes, dated October 22, 2016	
122C	Gulen Briefing Sheet (4 pages) Attachment (Gulen Briefing Sheet_2016.10.23.docx.tdf) to Email from Boston to Flynn, Subject: Weekly Conference Call Notes, dated October 22, 2016	
122D	Briefing on Gulen Related Charter Schools in Texas, Draft October 19, 2016 (2 pages) Attachment (Texas One Page.docx) to Email from Boston to Flynn, Subject: Weekly Conference Call Notes, dated October 22, 2016	
122E	Sphere Letter to FIG from Sphere Consulting, Re: Charter Schools and the Department of Education, dated October 18, 2016 (3 pages) Attachment (Charter Schools and DofEd.docx) to Email from Boston to Flynn, Subject: Weekly Conference Call Notes, dated October 22, 2016	
122F	Mula Mullah Board Attachment (Mula Mullah Board.pdf) to Email from Boston to Flynn, Subject: Weekly Conference Call Notes, dated October 22, 2016	
122G	Gulenopoly Board Attachment (Glenopoly.pdf) to Email from Boston to Flynn, Subject: Weekly Conference Call Notes, dated October 22, 2016	
122H	Sphere Letter to FIG from Sphere Consulting, Re: Charter Schools and the IRS, dated October 18, 2016 (2 pages) Attachment (Charter Schools and IRS.DOCX) to Email from Boston to Flynn, Subject: Weekly Conference Call Notes, dated October 22, 2016	
122I	20 October 2016 Update powerpoint (9 pages) Attachment (20Oct16Update.pptx.pptx) to Email from Boston to Flynn, Subject: Weekly Conference Call Notes, dated October 22, 2016	
122J	Image Attachment (horizon overview(1).png) to Email from Boston to Flynn, Subject: Weekly Conference Call Notes, dated October 22, 2016	
123A	Email from Kian to Flynn, Subject: Ekim's advisory agreement, dated October 22, 2016	

123B	Independent Advisory Services Agreement (2 pages) Attachment (Ekim Advisory Agreement rev3BK 109122016.docx) to Email from Kian to Flynn, Subject: Ekim's advisory agreement, dated October 22, 2016	
124A	Email from Boston to Kian, Subject: Sphere Plan, October 28, 2016	
124B	Sphere Letter to FIG from Miller, Re: Engagement Strategy and Activities, dated October 5, 2016 (3 pages) Attachment (attachment-1.docx) to Email from Boston to Kian, Subject: Sphere Plan, October 28, 2016	
125	Email from Kian to Alptekin, Subject: Conference on Monday, dated October 28, 2016	
126	Email from Alptekin to Kian, Subject: RE: Conference on Monday, dated October 19, 2016	
127A	Email from Flynn to Rafiekian, Subject: Ekim's advisory agreement, dated October 30, 2016	
127B	Independent Advisory Services Agreement, dated September 9, 2016 (2 pages) Attachment (Confidence Project.tdf) to Email from Flynn to Rafiekian, Subject: Ekim's advisory agreement, dated October 30, 2016	
128A	Email from Boston to McCauley, Subject: Project Meeting Wednesday at noon our office suite, dated October 31, 2016	
128B	Restoring Confidence, Project Update (4 pages) Attachment (FIG Presentation_GM.PPTX) to Email from Boston to McCauley, Subject: Project Meeting Wednesday at noon our office suite, dated October 31, 2016	
128C	Gulenopoly Board Attachment (Gulenopoly_OCT31.pdf) to Email from Boston to McCauley, Subject: Project Meeting Wednesday at noon our office suite, dated October 31, 2016	
129	Letter to FIG from Courtovich, Re: 1782 Discovery Process, dated November 08, 2016 (2 pages) Attachment (1782 Discovery Process.docx) to email Graham Miller to Jim Courtovich, dated March 27, 2019, Re: Follow-Up	
130	Email from Pilgram to Rafiekian, Subject: Morning Update 9/7, dated September 7, 2016	
131	Email from Flynn to Pilgrim, Subject: Sept 19 NYC, dated September 12, 2016	

132	Email from Rafiekian to Flynn, Subject: Sept 19 NYC, dated September 12, 2016	
133	Email from Rafiekian to Pilgram, Subject: HIGH LEVEL Meeting, dated September 12, 2016	
134	Email from Rafiekian to Flynn, Subject: High Level Meeting in New York, dated September 12, 2016	
135A	Email from Rafiekian to McCauley, Subject: Open Source information to kick off the investigative process, dated September 23, 2016	
135B	Open Source Information – Project Confidence, dated 7/30/16 (2 pages) Attachment to Email from Rafiekian to McCauley, Subject: Open Source information to kick off the investigative process, dated September 23, 2016	
136	Email from Cinar to Boston, Subject Re: Question, dated October 11, 2016	
137	Email from Rafiekian to Flynn, Subject: Meeting with Jim Courtovich, dated August 14, 2016	
138	Email from Rafiekian to Alptekin, Subject: Comm Check, dated September 27, 2016	
139	Email from Boston to Rafiekian, Subject: Comments on the document layout, dated November 5, 2016 (6 pages)	
140	Email from Miller to Courtovich, Subject: Re: Turkey – FARA v LDV, dated September 13, 2016 (2 pages)	
141A	YouTube Video Clip (1:38:00 – 1:48:00)	
141B	Transcript of YouTube Video Clip (1:38:00 – 1:48:00)	
142	Email from T. Neer to McCauley, Subject: Proposed Open Source Work Re: Gulen School, dated October 7, 2016 (2 pages)	
143	Statement, Elliott Investigative Services to Inovo BV, dated June 17, 2016 (6 pages)	
144	Email from Alptekin to Elliot, Subject: for your review, dated November 1, 2016	
145	Alptekin Skype file Handwritten notes, dated October 13, 2016	
146A	Email from Neer to McCauley, Subject: Status, dated October 20, 2016	

146B	Attachment (Letter.to Brian.docx) Email from Neer to Mccauley, Subject: Status, dated October 20, 2016	
147	Registration Statement (Received by NSD/FARA Registration Unit 10/26/2015 9:38:44 AM) Registrant: Amsterdam & Partners, LLC, Registration No. 6325 (6 pages)	
148	Exhibit A and Exhibit B to Registration Statement (Received by NSD/FARA Registration Unit 10/26/2015 9:38:49 AM) Registrant: Amsterdam & Partners, LLP, Registration No. 6325 (7 pages)	
149	Short Form Registration Statement (Received by NSD/FARA Registration Unit 10/26/2015 9:38:51 AM) Registrant: Robert R. Amsterdam, Registration No. 6325 (2 pages)	
150A	Dutch MLAT Request including Account Statement, date range June 20, 2016 to April 30, 2018 (33 pages)	
150A-1	Certificate of Authenticity of Business Records for ABN AMRO bank records	
151A	Email from Flynn to Rafiekian, Subject: Scanned Doc, dated September 8, 2016	
151B	Independent Advisory Services Agreement (3 pages) Attachment (B Project Confidence 1.pdf) to Email from Flynn to Rafiekian, Subject: Scanned Doc, dated September 8, 2016	
152	Email from Alptekin to Elliot, Subject: info, dated October 16, 2016	
153	Registration Statement / OMB Control No. 1124-0001 / Form NSD-1 (7 pages)	
154	Supplemental Statement / OMB Control No. 1124-0002 / Form NSD-2 (10 pages)	
155	Amendment to Registration Statement / OMB Control No. 1124-0003 / Form NSD-5 (2 pages)	
156	Exhibit B / OMB Control No. 1124-0004 / Form NSD-4 (2 pages)	
157	Short-Form Registration Statement / OMB Control No. 1124-0005 / Form NSD-6 (2 pages)	
158	Exhibit A / OMB Control No. 1124-0006 / Form NSD-3	
159	Statute – Foreign Agents Registration Act of 1938, as amended (12 pages)	
160	Regulations – Part 5 – Administration and Enforcement of Foreign Agents Registration Act of 1938, as amended (12 pages)	

161	Inovo, Flynn Intel Group, \$55,000, Invoice No. 00057, November 2016, Dated on or before November 25, 2016	
162	Chart FIG_EDVA Exhibits	
163	Chart Skype_Chats	

Respectfully submitted,

G. ZACHARY TERWILLIGER  
UNITED STATES ATTORNEY

/s/  
Evan N. Turgeon Trial Attorney  
Counterintelligence  
and Export Control Section National  
Security Division  
United States Department of Justice 950  
Pennsylvania Avenue, NW Washington,  
DC 20530  
(202) 353-0176  
[Evan.Turgeon@usdoj.gov](mailto:Evan.Turgeon@usdoj.gov)

By: /s/  
John T. Gibbs  
Virginia Bar No. 40380  
James P. Gillis  
Virginia Bar No. 65055  
Assistant United States Attorneys  
The Justin W. Williams  
United States Attorney's Office  
2100 Jamieson Avenue  
Alexandria, VA 22314  
(703) 299-3700  
(703) 299-3982 (fax)  
[James.P.Gillis@usdoj.gov](mailto:James.P.Gillis@usdoj.gov) [ibbs@usdoj.gov](mailto:ibbs@usdoj.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that on July 16, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which automatically generated a Notice of Electronic Filing (NEF) to counsel of record.

By: \_\_\_\_\_ /s/  
John T. Gibbs  
Assistant United States Attorneys  
United States Attorney's Office  
2100 Jamieson Avenue  
Alexandria, VA 22314  
Telephone (703) 299-3700